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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALEJANDRO ONETO-ALONSO,
individually;

Plaintiff,

Case No.: 2:19-cv-0639-JAD-BNW

vs.

FIRST PRIME MANAGEMENT INC., A
Nevada Corporation; **DANIEL MAZA-**
NORIEGA, individually; **DOES 1-10;** and
ROES A-Z;

Defendants.

STIPULATION TO STAY PROCEEDINGS

The parties to the above-referenced action respectfully request that the Court approve this stipulation seeking to stay this action for twenty-one (21) days or until October 25, 2019.

In support of this stipulation, the parties rely upon the following:

1. Plaintiff Alejandro-Oneto is represented by Paul S. Padda, Esq.
2. Defendant First Prime Management, Inc. is represented by Patrick W. Kang, Esq.
3. Mr. Kang has notified Plaintiff's counsel that he will shortly be filing an appearance for Defendant Daniel Maza-Noriega which should moot the request for a Clerk's Default.

- 1 4. The parties concur that a prior agreement between the parties governs the scope of
2 their dispute and that this matter should be referred to arbitration.
- 3 5. However, the parties are also in agreement that this matter should be stayed for a
4 period of 21 days (October 25, 2019) until they can decide upon an arbitrator. If the
5 parties cannot agree upon an arbitrator, then they will request that the Court assist in
6 the selection of an arbitrator.
- 7
- 8 6. In light of the foregoing, the parties respectfully request that the Court stay this
9 proceeding for 21 days pending the agreement to select an arbitrator. If the parties
10 can agree upon an arbitrator, they will file a stipulation of dismissal within 21 days.
11 If the parties are unable to agree upon an arbitrator, they will file a status report
12 within 21 days requesting a status conference with the Court to help select an
13 arbitrator.
14

15 Respectfully submitted,

16 /s/ Patrick W. Kang
17

/s/ Paul S. Padda

18 Patrick W. Kang, Esq.

Paul S. Padda, Esq.

19 Counsel for First Prime Management Inc.

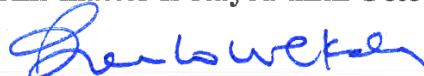
Counsel for Plaintiff

20 Dated: October 4, 2019

Dated: October 4, 2019

21
22 **IT IS SO ORDERED:**

23 The Court having reviewed the parties' stipulation to
24 stay proceedings pending the selection of an arbitrator,
25 it is hereby ordered that the stipulation is approved.
26 This matter is stayed until October 25, 2019.

27 

28 **United States Magistrate Judge**

DATED: 10/8/19

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, October 4, 2019, I caused to be served a copy of the foregoing document via the Court's CM/ECF system.


Paul S. Padda